

EXHIBIT 7

MsJeanFields_Rough

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2

REALTIME AND INTERACTIVE REALTIME

3

TRANSCRIPT

ROUGH DRAFT DISCLAIMER

4

IMPORTANT NOTICE: AGREEMENT OF PARTIES

5

6

We, the party working with realtime and
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if we choose to use the realtime rough
draft screen or the printout, that we are
doing so with the understanding that the
rough draft is an noncertified copy.

9

We further agree not to share, give, copy,
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realtime rough draft in any form (written
or computerized) to any party. However,
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have limited internal use of same with the
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realtime rough draft and/or any
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with the final transcript upon its
completion.

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Case: NAACP VS. ERCSD

15

Date: FEBRUARY 8, 2018

REPORTER'S NOTE:

16

Since this deposition has been realtimed
and is in rough draft form, please be
aware that there may be a discrepancy
regarding page and line number when
comparing the realtime screen, the rough
draft, rough draft disk, and the final
transcript.

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Also please be aware that the realtime
screen and the noncertified rough draft
transcript may contain untranslated steno,
reporter's note in double parentheses,

21

MsJeanFields_Rough
misspelled proper names, incorrect or
22 missing Q/A symbols or punctuation, and/or
nonsensical English word combinations.
23 All such entries will be correct on the
final, certified transcript.
24 Court Reporter's Name:THERESA TRAMONDO
FIRM: VERITEXT LEGAL SOLUTIONS
25

2

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2 UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
3 ----- X
NATIONAL ASSOCIATION FOR
4 THE ADVANCEMENT OF
COLORED PEOPLE,
5 SPRING VALLEY BRANCH, et al.,
6 Plaintiffs,
7 vs. No.
7:17-cv-08943
8 EAST RAMAPO CENTRAL
9 SCHOOL DISTRICT, et al.,
10 Defendants.
----- X
11

12 Month Date, 2018
13 Time ^ a.m. ^ p.m.
14
15

16 Deposition of WITNESS NAME, held
17 at the offices of Firm, Address, City,

MsJeanFields_Rough

18 State, pursuant to Replace, before Theresa
19 Tramondo, AOS, CLR, a Notary Public of the
20 State of New York.
21
22
23 Reported by:
24 THERESA TRAMONDO, AOS, CLR
25 JOB NO. ^ ^

3

1
2 APPEARANCE OF COUNSEL:
3 FOR PLAINTIFF:
4 [!FIRM1]
5 [!ADDRESS-A1]
6 [!CITY1], [!STATE1] [!ZIP1]
7 BY: [!ATTORNEY1]
8 [!E-MAIL1]
9 [!PHONE NUMBER1]
10 FOR ^ PLAINTIFF ^ DEFENDANT:
11 [!FIRM2]
12 [!ADDRESS-A2]
13 [!CITY2], [!STATE2] [!ZIP2]

MsJeanFields_Rough

14 BY: [!ATTORNEY2]
15 [!E-MAIL2]
16 [!PHONE NUMBER2]
17 FOR ^ PLAINTIFF ^ DEFENDANT:
18 [!FIRM3]
19 [!ADDRESS-A3]
20 [!CITY3], [!STATE3] [!ZIP3]
21 BY: [!ATTORNEY3]
22 [!E-MAIL3]
23 [!PHONE NUMBER3]
24
25

4

1
2 APPEARANCE OF COUNSEL (cont'd):
3
4 FOR ^ PLAINTIFF ^ DEFENDANT:
5 [!FIRM4]
6 [!ADDRESS-A4]
7 [!CITY4], [!STATE4] [!ZIP4]
8 BY: [!ATTORNEY4]
9 [!E-MAIL4]

MsJeanFields_Rough

10

11 FOR ^ PLAINTIFF ^ DEFENDANT:

12 [!FIRM5]

13 [!ADDRESS-A5]

14 [!CITY5], [!STATE5] [!ZIP5]

15 BY: [!ATTORNEY5]

16 [!E-MAIL5]

17 [!PHONE NUMBER5]

18 ALSO PRESENT:

19 NAME

20 NAME

21

22

23

24

25

5

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STIPULATIONS

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5

IT IS HEREBY STIPULATED AND AGREED,

MsJeanFields_Rough

6 by and among counsel for the respective
7 parties hereto, that the filing,
8 sealing and certification of the within
9 deposition shall be and the same are
10 hereby waived;

11 IT IS FURTHER STIPULATED AND AGREED
12 that all objections, except as to form
13 of the question, shall be reserved to
14 the time of the trial;

15 IT IS FURTHER STIPULATED AND AGREED
16 that the within deposition may be signed
17 before any Notary Public with the same
18 force and effect as if signed and sworn to
19 before the Court.

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MsJeanFields_Rough

2 BY THE COURT REPORTER:

3 Q. Please state your full name for
4 the record.

5 A. Jean Fields, F-I-E-L-D-S.

6 Q. What is your address?

7 A. Home, 3 Deer Run Road, Pomona,
8 New York 10970.

9 W I T N E S S N A M E , called as a
10 witness, having been duly sworn by a
11 Notary Public, was examined and testified
12 as follows:

13 EXAMINATION BY

14 ^ HEADERS

15 MR. LEVINE:

16 Q. We are on the record. Good
17 afternoon. My name is Randall Levine. I'm
18 an attorney for the East Ramapo Central
19 School District.

20 Could you please state your full
21 name for the record.

22 A. Jean E Fields.

23 Q. Thank you, Ms. Fields.

24 Do you understand you're here
25 today to give testimony in a case calls

MsJeanFields_Rough

7

1

2 NAACP of Spring Valley versus the East

3 Ramapo Central School District?

4 A. Yes.

5 Q. Yes?

6 A. Um-hum.

7 Q. Have you ever been deposed

8 before?

9 A. Yes I have.

10 Q. When were you deposed last?

11 A. Several years ago I don't

12 remember the year.

13 Q. Do you remember what that case

14 was about?

15 A. Yes, I do.

16 Q. What was that case about?

17 A. A gentleman was suing the school

18 district for discrimination against Muslim.

19 Q. And you gave a deposition in

20 that case?

21 A. Yes.

MsJeanFields_Rough

22 Q. Did you testify in court in that
23 case?

24 A. Yes.

25 Q. Since you have done this before

8

1
2 we will quickly go over the ground rules
3 because you already know them in a
4 deposition I'll ask you a series of
5 questions your job today is to answer each
6 question as fully and truthfully as you can
7 to the best of your recollection do you
8 understand?

9 A. Yes.

10 Q. As you can see the conversation
11 we're going to have today is going to be
12 transcribed and to make life easier for the
13 court reporter, thinks go much more smoothly
14 if we don't speak over each other do you
15 understand?

16 A. Yes.

17 Q. I see that you do so I'll ask a?

MsJeanFields_Rough

18 "QUESTION: To the extent I'm
19 able when I am finished speaking, I
20 will wait for you to finish speaking
21 and things will read much better. Do
22 you understand?

23 A. Yes.

24 Q. If you have any trouble
25 understanding any question I ask you please

9

1
2 ask percent to clarify or rephrase and I
3 will do so. Downs?

4 A. Yes.

5 Q. If you don't tell me that you
6 doesn't understand my question I will assume
7 that you have understood it though okay?

8 A. Okay.

9 Q. If you need to take a break at
10 any time during the deposition please just
11 ask okay?

12 A. Yes.

13 Q. All I would ask if I have asked

MsJeanFields_Rough

14 you a question and it's still pending answer
15 the question, and then we will take the
16 break okay?

17 A. Yes.

18 Q. You may at times here your
19 counsel object to one of my questions. If
20 that happens, that's not an instruction to
21 you not to answer the question. So if you
22 understand my question you should still
23 answer it, okay?

24 A. Yes.

25 Q. And if your counsel is going to

10

1
2 instruct you not to answer he'll do so
3 expressly, right?

4 A. (Nodding.)

5 Q. So do you understand?

6 A. Yes.

7 Q. Because this is being
8 transcribed only verbal answers will appear
9 on the transcript, so if I ask you a

MsJeanFields_Rough

10 question I need you to answer with yes no
11 some other verbal response head shakes nods,
12 shoulder shrugs don't show up on paper okay?

13 A. Yes.

14 Q. Before we get going do you have
15 any questions for me about how the
16 deposition will go?

17 A. No I don't.

18 Q. A come of preliminaries is there
19 any reason you could think of why you
20 wouldn't be able to give full and complete
21 testimony today?

22 A. No.

23 Q. Are you in good health?

24 A. Reasonably.

25 Q. Have you taken any medications

11

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2 today that might affect your memory?

3 A. No.

4 Q. Are you represented by counsel
5 today?

MsJeanFields_Rough

6 A. Yes.

7 Q. Is that your counsel sitting
8 right next to you?

9 A. Mr. Jason.

10 Q. Okay I think these are all the
11 preliminaries.

12 I would like to mark for
13 identification purposes Fields Exhibit 1
14 which the court reporter will hand to you
15 momentarily.

16 (Fields Exhibit # , description,
17 marked for identification, as of this
18 date.)

19 Q. The document that has been
20 placed in front of you, just now and marked
21 as Fields Exhibit 1 has a title called the
22 declaration of Jean E Fields do you see
23 that?

24 A. Yes, I do.

25 Q. If you would turn to the final

12

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MsJeanFields_Rough

2 page of the document page 13 and I am going
3 to ask you to look at the signature close to
4 the middle of the page, is that your
5 signature?

6 A. Yes, it is.

7 Q. Do you recall signing this
8 document on December 1, 2017?

9 A. Yes, I do.

10 Q. Have you seen this document
11 before?

12 A. Yes.

13 Q. Did you write the declaration of
14 Jean E Fields?

15 A. I dictated it.

16 Q. Without telling me anything that
17 you may have discussed or told your lawyers,
18 to whom did you dictate your declaration?

19 A. Attorney Jason.

20 Q. Did anybody help you with the
21 dictation of your declaration?

22 A. No.

23 Q. Are all the words in here to the
24 best of your knowledge your own?

25 A. Can I read it first?

MsJeanFields_Rough

13

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2 Q. Sure.

3 A. Yes.

4 Q. Thank you.

5 You used to be an employee of
6 the East Ramapo Central School District; is
7 that right?

8 A. Yes.

9 Q. How long did you work for East
10 Ramapo?

11 A. 19 years.

12 Q. And how long have you resided in
13 the East Ramapo Central School District?

14 A. Approximately 27, 28 years.

15 Q. Did you retire from the East
16 Ramapo Central School District?

17 A. Yes, I did.

18 Q. Was that in 2013 that you
19 retired?

20 A. Yes.

21 Q. What have you been doing since

MsJeanFields_Rough

22 you retired in 2013?

23 MR. JASON: Objection.

24 A. Volunteering here and there.

25 Q. Assuming you have been doing

14

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2 something since you retired what have you
3 been doing since 2013?

4 A. I serve on a few boards, I
5 travel, I help with my grandchildren.
6 That's pretty much it.

7 Q. What boards do you serve on?

8 A. Salvation army, R S V P.

9 Q. What is that?

10 A. Retired seniors volunteer
11 program.

12 Q. Anything else?

13 A. JAMCCAR. It's Jamaican American
14 civic association.

15 Q. Anything else?

16 A. The NAACP the executive board.

17 Q. What is your role on the

MsJeanFields_Rough

18 executive board of the NAACP?

19 A. I'm the cochair of the education
20 committee.

21 Q. How long have you served in that
22 capacity?

23 A. A few years. I don't remember
24 when I started.

25 Q. Would you say you served more

15

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2 than two years?

3 A. Yes.

4 Q. Nor than five years?

5 A. I don't know if it's that long.
6 I couldn't give you a date.

7 Q. Somewhere around five years?

8 A. Probably less than five years.

9 Q. Like four years?

10 A. I can't give you a date. I
11 don't remember.

12 Q. I'm just trying to get a sense.

13 Did you serve in any other

MsJeanFields_Rough

14 capacity for the NAACP before you served on
15 the executive board?

16 A. No. I was just a member.

17 Q. How long were you a member?

18 A. About approximately seven years.

19 Q. Were you involved in the NAACP's
20 activities as a member?

21 MR. JASON: Objection.

22 A. Somewhat.

23 Q. Like what? What did you do as a
24 member?

25 A. Went to meetings.

16

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2 Q. Did you work on any particular
3 projects?

4 A. No.

5 Q. What sort of meetings did you
6 attend?

7 A. Monthly meetings.

8 Q. Are you involved in politics in
9 the East Ramapo central school district in

MsJeanFields_Rough

10 any way?

11 A. Could you rephrase that?

12 Q. Sure. Why don't we come back to
13 it actually.

14 Let direct your attention to
15 paragraph 26 of your declaration which is on
16 page 8.

17 A. Um-hum.

18 Q. The first sentence of paragraph
19 26 I'll read so everybody could follow along
20 says from 2003 to 2013 I was a regular
21 attendee at board meetings does that mean
22 you were a regular attendee of East Ramapo
23 school board meetings?

24 A. Yes.

25 Q. Why were you a regular attendees

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2 of board meetings at in that time?

3 A. I was a parent in the dis direct
4 I was an employee in the district I was a
5 community member.

MsJeanFields_Rough

6 Q. For those reasons you just
7 listed you were interested in the activities
8 at school board meetings; is that fair?

9 A. Yes.

10 Q. Did you vote in school board
11 elections during the same time period from
12 2003 to 2013?

13 A. Yes, I did.

14 Q. Did you work for any candidates
15 for school board during that time period on
16 their campaign, I mean?

17 A. No I supported candidates, but I
18 wasn't on the campaign.

19 Q. The second sentence of paragraph
20 26, you say during that time I witnessed a
21 shift in the tenor of these board meetings
22 as the board became hostile and unwelcoming
23 to members of the public school community
24 who attended do you see that?

25 A. Yes.

18

MsJeanFields_Rough

2 Q. When you use the phrase public
3 school commune in paragraph 26 what do you
4 mean by that?

5 A. The parents of the public school
6 students.

7 Q. Is there anybody else besides
8 the parents of public school students who
9 would be members of the public school
10 community?

11 A. Yes.

12 Q. Who else would you say I'm only
13 asking what you say who else would you say
14 counts as a member of the public school
15 community?

16 A. I think anyone who advocates for
17 public school education.

18 Q. It is not necessary to be the
19 parent of a public school students to be a
20 member of the public school community; is
21 that right?

22 A. That's true.

23 Q. Is your understanding of the
24 public school community in any way limited
25 by a person's race?

MsJeanFields_Rough

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2 A. No.

3 Q. So white people could be members
4 of the public school community?

5 A. Why of course.

6 Q. And Latino people could be
7 members of the public school community?

8 A. Yes.

9 Q. And black people could be member
10 of the public school community?

11 A. Yes.

12 Q. And Jewish people could be
13 members of the public school community?

14 A. Yes.

15 Q. Is there anybody who can't
16 absolute member of the public school
17 community?

18 A. I guess anybody who does not
19 advocate for public school.

20 Q. What to you mean by advocate for
21 public school?

MsJeanFields_Rough

22 A. That is committed to strong
23 public school education.

24 Q. Is that like a -- is what you're
25 describing a policy preference in favor of

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2 public school programs is that a fair way to
3 describe it?

4 A. I don't know.

5 Q. I'm just trying to understand
6 what mean by advocate for public schools.
7 So anybody who has a particular preference
8 for strong or well funded public school is
9 there a policy angle to it?

10 A. I don't know about a policy, but
11 anyone who believes and advocates for public
12 school education would that be community
13 even if though they don't have kids in
14 public school.

15 Q. What specifically might somebody
16 who advocates for the public school in your
17 understand, what specifically might they be

MsJeanFields_Rough

18 advocating for?

19 A. Fabulous education, strong
20 programs, just the best that a kid could get
21 in the public school.

22 Q. Would an advocate for public
23 schools advocate for better funding of
24 public school?

25 MR. JASON: Objection.

21

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2 A. I think it advocates for the
3 best education that a students could obtain
4 in a public school whatever that means I
5 mean whatever avenues.

6 Q. Turning back to paragraph 26,
7 you say that you witnessed a shift in the
8 tenor of these board meetings as the board
9 became hostile and unwelcoming to members of
10 the public school community to attended if
11 the board is hostile to the members of the
12 public school community what community is
13 the board from?

MsJeanFields_Rough

14 A. The majority private school
15 community.

16 Q. I'm just asking for your
17 understanding what do you mean when you say
18 private school community?

19 A. Any student in school that is
20 not attending public school of a school age.

21 Q. That would be private school
22 students, right?

23 A. Yes.

24 Q. Is the private school community
25 limited to private school students

22

1
2 themselves?

3 A. I think just that the public
4 school community is limited to those persons
5 who advocate for public school I think it
6 would be the same for private school.

7 Q. So the private school community
8 in your understanding is made up of people
9 who advocate for private schools?

MsJeanFields_Rough

10 A. Private educations yes.

11 Q. What sort of things do people
12 advocate for private education advocate for
13 specifically?

14 MR. JASON: Objection.

15 A. Not sending their child to a
16 public school.

17 Q. Anything else?

18 A. Not that I know of.

19 Q. When you say that you witnessed
20 in a shift of the tenor of these board
21 meetings when between 2003 and 2013 did you
22 witness that shift?

23 A. Particularly I would say around
24 2005, there was a public school trustee on
25 the board education who was a holocaust

23

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2 survivor and she advocated strongly for
3 strong programs she just loved students
4 loved kids and she lost her seat on that
5 board.

MsJeanFields_Rough

6 Q. Do you remember her name?

7 A. Yes, I do.

8 Q. What was her name?

9 A. Georgeanne HYDE, H Y D E.

10 Q. You witnessed a shift in the
11 tenor in 2005 with Ms. Hyde's departure from
12 the board did anything else happen in 2005
13 that contributed to your sense that the
14 tenor had changed?

15 A. Not that I can recall.

16 Q. Do you recall who else was on
17 the school board at the time in 2005?

18 A. I don't recall all the names.

19 Q. Do you remember anything about
20 the other school board members in 2005?

21 A. No, I don't.

22 Q. The only thing that changed in
23 2005 was that Ms. Hyde left the board and
24 that caused a shift in the tenor of the
25 board to make them hostile to the members of

24

MsJeanFields_Rough

2 the public school community is that your
3 testimony?

4 MR. JASON: Objection.

5 A. I don't know. I don't know what
6 else happened. I don't remember what else
7 happened.

8 Q. But you remembered that the
9 tenor of the meetings changed and the board
10 became hostile and unwelcoming to members of
11 the public school community?

12 A. Yes.

13 Q. But you don't remember why that
14 happened or why you felt that way?

15 A. I believe that Ms. Hyde was
16 replaced by a member of the private school
17 community.

18 Q. Do you remember who that was?

19 A. I don't.

20 Q. In that context when you say
21 private school community do you mean someone
22 from the orthodox or Hasidic Jewish
23 communities?

24 A. Yes, I do.

25 Q. How many people on the board in

MsJeanFields_Rough

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2 2005 were from the orthodox and Hasidic

3 Jewish communities?

4 MR. JASON: Objection.

5 A. I don't remember.

6 Q. Was it just the one who replaced

7 Georgeanne Hyde that you recall?

8 A. I don't remember.

9 Q. Was the presents of the one

10 orthodox or Hasidic Jewish board member that

11 replaced Georgeanne Hyde the reason in there

12 was a shift in tenor of the board meetings?

13 A. I couldn't tell you that because

14 I don't remember who was there before if I

15 had a list I could, but I don't remember.

16 Q. It's an exam knots a test I only

17 want to know what you remember?

18 A. Okay.

19 Q. When you say the board became

20 hostile and unwelcoming to members of the

21 public school community, what do you mean by

MsJeanFields_Rough

22 hostile and unwelcoming?

23 A. Prior to that in order to being
24 a public speaker at a board meeting one
25 would come in fill out a card hand it in and

26

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2 they able to speak at the beginning of the
3 meeting. When the tenor changed the
4 visitors or the people at the board meeting
5 were relegated to speaking at the end of the
6 meeting. And at the end of the meeting
7 meant sometime executive sessions would last
8 for hours and hours.

9 Q. Did those changes you just
10 describe occur in 2005?

11 A. I don't remember when. I know
12 there was a gradual change, but I don't
13 remember when it changed.

14 Q. Was there anything else besides
15 those two things you just described that you
16 think represented the board becoming hog
17 tile and unwelcoming to members of the

MsJeanFields_Rough

18 public school community?

19 A. I remember people at the board
20 asking questions of the board members and
21 never getting answers feeling sometimes or
22 maybe they needed to do some research so
23 they would give it to us next time and they
24 never did. Their questions all went
25 unanswered.

27

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2 Q. During that same time period
3 around 2005, did you ever ask questions of
4 the board of the education that went
5 unanswered?

6 A. No. I was an employee.

7 Q. Do you remember any specific
8 instance of someone else asking questions
9 that went unanswered?

10 A. No, but I do remember people
11 letting the board know that the questions
12 had been asked meetings or times before and
13 they never got an answer.

MsJeanFields_Rough

14 Q. Prior to 2003 did you attend any
15 board meetings?

16 A. Yes, I did.

17 Q. Do you know whether prior to
18 2003 there were public school advocates on
19 the board of education?

20 A. Could you repeat that?

21 Q. Yes. I'm asking about prior to
22 2003. So in paragraph 26 you're talking
23 about 2003 to 2013?

24 A. Uh-hum.

25 Q. Prior to 2003, were there public

28

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2 school advocates on the board of education?

3 A. I believe.

4 Q. After 2003 were there public
5 school advocates on the board of education?

6 A. I believe so also.

7 Q. In 2003 do you know whether a
8 majority of the board of education were
9 public school advocates?

MsJeanFields_Rough

10 A. I don't remember. I know the
11 majority transition happened slowly, but I
12 don't remember when.

13 Q. Same time period prior to 2003,
14 were there any African-American members of
15 the board of education?

16 MR. JASON: Objection.

17 Q. If you know?

18 A. Yes.

19 Q. Do you recall the names of any
20 African-American members of the board of
21 education up to and including 2003?

22 A. Yes.

23 Q. Who do you recall?

24 A. Jacqueline Anderson, Susan
25 Gordon, Dr. Daniel Bright, Wendell Watford

29

1

2 and I believe Susan Young Mercer. I don't
3 remember the years that she served though.

4 SPELL

5 Q. After 2003, do you recall any

MsJeanFields_Rough

6 African-American members of the board of
7 education being elected?

8 So were any African-American
9 members of the board of education elected
10 after 2003?

11 MR. JASON: Objection.

12 A. I believe so. I don't remember
13 who they are, but I believe so.

14 Q. Do you recall any names?

15 A. I don't know who they are -- who
16 they were.

17 Q. To the best of your recollection
18 had there ever been a time in the last 25
19 years when there was a full nine member
20 board of education and there were no
21 African-American board members?

22 A. I don't recall.

23 Q. So let me ask the inverse
24 proposition to the best of your recollection
25 when the board has had a full nine member

30

MsJeanFields_Rough

2 board has it always had at least one

3 African-American board member?

4 A. Last 25 years you said.

5 Q. Yes?

6 A. I don't remember.

7 Q. Best you can recall?

8 A. I don't remember.

9 Q. But you don't remember any times
10 specifically when there were no
11 African-American board members on the school
12 board; is that fair?

13 A. No.

14 Q. I will ask it again. Sorry.

15 You done remember any time in
16 the last 25 years when there were no
17 African-American board members on the school
18 board, right?

19 A. Right.

20 Q. Did something change in the
21 broader community in East Ramapo that led to
22 the or was connected with the change that
23 you observed on the school board?

24 MR. JASON: Objection.

25 MR. LEVINE: That's fair let me

MsJeanFields_Rough

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2 ask it again.

3 Q. Did something change in the
4 broader up community of East Ramapo in
5 connection with the change that you observed
6 on the school board?

7 A. I believe that the that the
8 candidates that represented the public
9 sector were always unsuccessful in their
10 bids for being a trustee.

11 Q. When you say public sector in
12 that context do you mean the public school
13 community?

14 A. Yes.

15 Q. Did the demographics of East
16 Ramapo change in some way between 2003 and
17 2013?

18 MR. JASON: Objection.

19 A. Yes.

20 Q. How do you know that?

21 A. We had an influx of students

MsJeanFields_Rough

22 right after the earthquake in Haiti.

23 Q. So the demographic change that
24 you observed in East Ramapo, that involved
25 the decision of Haitian people to the East

32

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2 Ramapo school district; is that right?

3 A. Haitian students and some Latino
4 students I think.

5 Q. Do you know whether the
6 population of orthodox and Hasidic Jews in
7 the East Ramapo school district also grew
8 between 2003 and 2013?

9 A. I don't know for sure, but I
10 would imagine.

11 Q. Why would you imagine that?

12 MR. JASON: Objection.

13 Q. I'm just asking why you would do
14 so?

15 A. Populations grow there have been
16 lots of people moving into the county.

17 Q. Between 2003 and 2013 several

MsJeanFields_Rough

18 new members of the board of education were
19 elected from the orthodox and Hasidic
20 screw-ish community, right?

21 A. Say that again.

22 Q. Between 2003 and 2013 several
23 new members of the board of education were
24 elect and they were from the orthodox and
25 Hasidic Jewish communities, right?

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2 A. Yes.

3 Q. At some point between 2013 and
4 2013 people from the orthodox and Hasidic
5 Jewish community elected a majority of the
6 board members; is that right?

7 MR. JASON: Objection.

8 A. Yes.

9 Q. So at some point between 2003
10 and 2013 a majority of the members of the
11 board of education were people from the
12 orthodox and Hasidic Jewish community right?

13 MR. JASON: Objection.

MsJeanFields_Rough

14 A. Yes.

15 Q. Do you know when between 2003
16 and 2013 that occurred?

17 A. I couldn't be specific.

18 Q. Was it in 2005?

19 MR. JASON: Objection.

20 A. It may have started then, but I
21 couldn't tell you. I mean I simply don't
22 remember.

23 Q. Were the board members from the
24 orthodox and Hasidic Jewish community
25 hostile and unwelcoming to members of the

34

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2 public school community who attended?

3 MR. JASON: Objection to form.

4 A. I believe we covered by not
5 answering questions.

6 Q. Now I'm just trying to ask
7 specifically about which board members. All
8 right. Before you said the board became
9 hostile. Now I'm wondering were the board

MsJeanFields_Rough

10 members who were from the orthodox and
11 Hasidic Jewish community hostile and
12 unwelcoming to the members of the public
13 school community?

14 A. Yes.

15 Q. Did you ever develop an
16 understanding in your own mind of why the
17 orthodox and Hasidic Jewish board members
18 were hostile and unwelcoming?

19 A. No I can't get in their heads.
20 I don't know.

21 Q. Did you ever speak with any of
22 the orthodox and Hasidic Jewish board
23 members between 2003 and 2013?

24 A. Yes.

25 Q. Who did you speak with?

35

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2 A. Any member of the board that
3 visited my school I would have to escort
4 them around.

5 Q. Did you tell them that in your

MsJeanFields_Rough

6 view they had become hostile and unwelcoming
7 to members of the public school community?

8 A. Absolutely not.

9 Q. Why not?

10 A. Because administrators were not
11 allowed to talk to board members. We had to
12 go through -- there was a protocol.

13 Q. What do you mean by that?

14 A. While they were in our schools,
15 we could not go and talk to them. If you
16 met them outside and they said hi, could you
17 say hi to them. While they're in school you
18 could not.

19 Q. I understand what about outside
20 of school?

21 A. No.

22 Q. Why not?

23 A. Because we don't live in the
24 same areas.

25 Q. Turn to the same page bottom of

36

MsJeanFields_Rough

2 the page, page 8 paragraph 28, so folks
3 could read along I'll read it, the board's
4 attentiveness and responsiveness to the
5 public school communities began to decline
6 around 2005 when candidates backed by
7 organizations and leaders favoring lower
8 taxes and maintaining a high level of
9 district services for private school
10 students gained a majority of seats on the
11 board. Do you see that paragraph?

12 A. Yes, I do.

13 Q. As you sit here today do you
14 believe that paragraph is accurate?

15 A. Yes, I do.

16 Q. When you say organizations and
17 leaders favoring lower taxes and maintaining
18 a high level of didn't services for private
19 school students, what organizations are you
20 referring to?

21 A. White organizations that lived
22 in the Monsey, new square Kaser
23 neighborhoods.

24 Q. Do you mean organizations from
25 the orthodox and Hasidic Jewish communities?

MsJeanFields_Rough

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2 A. Yes.

3 MR. JASON: Objection.

4 Q. By organizations in the context
5 of paragraph 28, are you referring to
6 organizations from the orthodox and Hasidic
7 Jewish communities?

8 A. Yes.

9 Q. When you say leaders in the
10 context of that paragraph, who do you mean?

11 A. The same thing.

12 Q. So by leaders in paragraph 28 do
13 you mean leaders from the orthodox and
14 Hasidic Jewish communities?

15 A. Yes.

16 Q. How do you know if you know that
17 those organizations and leaders favored
18 lower taxes?

19 MR. JASON: Objection.

20 A. Because I've been to board
21 meetings where they stood up and basically

MsJeanFields_Rough

22 said on behalf of their communities that

23 they wanted lower taxes.

24 Q. Do you know whether they're

25 referring to property taxes?

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2 A. I imagine so, yes.

3 Q. How do you know the -- that they

4 favored maintaining a high level of district

5 services for private school students?

6 A. They also said that.

7 Q. Other than people from the

8 orthodox and Hasidic Jewish community

9 speaking at board meetings have you ever

10 heard anyone else from the orthodox and

11 Hasidic Jewish communities express that they

12 favor lower taxes?

13 A. No, but I might add that the

14 person who spoke indicated that he spoke on

15 behalf of the organization. He belonged to

16 an organization.

17 Q. Do you recall the name of the

MsJeanFields_Rough

18 organization?

19 A. No I don't.

20 Q. Did you ever form an

21 understanding of why the orthodox and

22 Hasidic Jewish communities favored lower

23 taxes?

24 MR. JASON: Objection.

25 A. No.

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2 ^ CK fix communities.

3 Q. Did you ever hear anyone say why

4 this particular organization from the

5 orthodox and Hasidic Jewish communities

6 favored lower taxes?

7 A. No.

8 Q. Do you have an understanding of

9 your own?

10 A. No.

11 Q. In the same paragraph when you

12 say maintaining a high level of district

13 services for private school students, what

MsJeanFields_Rough

14 specifically are you talking about there?

15 A. Whatever services the private
16 schools get from the distribute.

17 Q. Such as?

18 A. Mandated services,
19 transportation and books that's all comes to
20 mind.

21 Q. When you say mandated services
22 what services are mandated?

23 A. Mandated service is a term that
24 refers to special education students and any
25 service that they're required.

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2 Q. It's only for special education
3 students though?

4 A. Mandated services only applies
5 to special ed.

6 Q. In paragraph 28 you say that
7 candidates backed by organizations that
8 favor lower taxes and maintaining a high
9 level of district services for private

MsJeanFields_Rough

10 school students gained a majority of seats
11 on the board. So by that, do you mean that
12 in the 2005 election a majority of the board
13 of education were members of the orthodox
14 and Hasidic Jewish community?

15 A. I don't know that. I don't
16 remember if it was 2005.

17 Q. But it was around 2005, right?

18 A. Yes.

19 MR. JASON: Objection.

20 Q. In your mind is there anything
21 wrong with members of the orthodox and
22 Hasidic Jewish community favoring lower
23 taxes?

24 A. Absolutely not. I'd like lower
25 tax as to.

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2 Q. In your mind is there anything
3 wrong with members of the orthodox and
4 Hasidic Jewish community favoring a high
5 level of district services for private

MsJeanFields_Rough

6 school students?

7 A. No.

8 Q. Is there anything wrong with

9 members of the orthodox and Hasidic Jewish

10 communities running for seats on the school

11 board?

12 A. No.

13 Q. Turn to page 2 at the bottom of

14 the page paragraph 8, I'm paraphrasing

15 correct me if I'm wrong, but paragraph 8

16 discussing budget cuts that affected the

17 school district beginning around 2009; is

18 that right?

19 A. ; is that correct.

20 Q. Do you recall for how many

21 school years beginning in 2009 budget cuts

22 continued so let me take that in turns

23 actually to make it clear.

24 Were there cuts to the school

25 district budget in 2009 to your

42

MsJeanFields_Rough

2 recollection?

3 A. Yes.

4 Q. Do you remember whether there
5 were cuts to the school district budget in
6 2010?

7 A. Yes.

8 Q. Were there cuts to the school
9 district budget in 2010?

10 A. I think the cuts went on for a
11 few years.

12 Q. Do you remember whether there
13 was cuts to the budget in 2011?

14 A. I don't remember.

15 Q. Do you remember whether there
16 were cuts to the budget in 2012?

17 A. There were.

18 Q. Do you remember whether there
19 were any cuts to the budget in 2013?

20 A. That I don't remember either.

21 Q. In your role as a school
22 district employee at the time, did you ever
23 form an understanding of why there were cuts
24 to the budget?

25 MR. JASON: Objection.

MsJeanFields_Rough

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2 A. Would you please repeat that.

3 Q. Yes. I will ask the question
4 again.

5 Did you ever form an
6 understanding of why there were cuts to the
7 school district's budget --

8 MR. JASON: Objection.

9 Q. -- in that time?

10 MR. JASON: Sorry.

11 A. What I understood was that an
12 order came from the superintendent who got
13 her orders from the board that we needed to
14 slash certain areas. It was my job to make
15 sure that happened.

16 Q. So was your understanding that
17 the board of education directed the
18 superintendent to cut the budget?

19 A. Yes, because they're the only
20 ones with the authority to do that.

21 MR. LEVINE: I'm going to mark

MsJeanFields_Rough

22 for identification what we'll call
23 Fields Exhibit 2.
24 (Fields Exhibit # , description,
25 marked for identification, as of this

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1
2 date.)
3 Q. Please take a look at the
4 document that has been marked as Fields
5 Exhibit 2 which I will identify as a letter
6 to Dr. Joel Klein from the state education
7 department dated December 14, 2012, do you
8 see that?
9 A. Yes, I do.
10 Q. Take a minute to look it over
11 and just look up at me and let me know when
12 you're ready to talk about it.
13 A. Yes.
14 Q. In December of 2012, were you
15 still working for the East Ramapo Central
16 School District?
17 A. Yes.

MsJeanFields_Rough

18 Q. What was your position?
19 A. Principal.
20 Q. You were a principal of the high
21 school, right?
22 A. Yes.
23 Q. Have you ever seen this document
24 that I have just showed you that is marked
25 as Exhibit 2?

45

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2 A. No I haven't.
3 Q. Did you read the document just
4 now?
5 A. Yes.
6 Q. Do you understand what it is?
7 A. Pretty much.
8 Q. What is your understanding of
9 what it says?
10 A. There is a deficit.
11 MR. JASON: Objection.
12 Q. Right.
13 And you understand that it is a

MsJeanFields_Rough

14 direction from the commissioner of
15 education's office to the board of education
16 to take additional actions to reduce the
17 budget deficit?

18 MR. JASON: Objection.

19 A. Yes, I do.

20 Q. Did you at any time form an
21 understanding of why the district had a
22 budget deficit?

23 MR. JASON: Objection.

24 A. Somewhat.

25 Q. What was your understanding?

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2 A. At one points there was a
3 discussion about too many or inordinate
4 amount of special education students going
5 to other schools where the district could
6 provide the services that they were going to
7 other schools for.

8 Q. How does that relate in your
9 mind to the budget deficit?

MsJeanFields_Rough

10 A. It costs money to send them

11 someplace else.

12 Q. Do you know how much money?

13 A. I don't know. No.

14 Q. Do you know of anything else

15 that in your mind you associated with the

16 budget deficit?

17 MR. JASON: Objection.

18 A. No.

19 Q. Do you know whether the East

20 Ramapo Central School District is obligated

21 to provide education services to private

22 school students who live in the district?

23 MR. JASON: Objection.

24 A. Say that again.

25 Q. Do you know whether the East

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2 Ramapo Central School District provides

3 education services to private school

4 students who live in the district?

5 A. Yes.

MsJeanFields_Rough

6 Q. Do you know how many private
7 school students live in the school district?

8 A. I couldn't tell you a number.

9 Q. Have you ever known how many
10 private school students live in the school
11 district?

12 A. No I know it's a lot more than
13 public school students.

14 Q. Would you feel comfort
15 estimating?

16 A. Two to three times as many.

17 Q. Do you know whether the fact
18 that there are two to three times as many
19 private school students has an impact on the
20 district's budget?

21 A. Do I know why?

22 Q. Do you know whether it does?

23 A. I'm sure it does.

24 Q. Do you know why the fact that
25 the district private school students

48

MsJeanFields_Rough

2 outnumber the public school students affects
3 the district's budget?

4 MR. JASON: Object.

5 A. No I don't.

6 Q. Do you know -- how about this:

7 Do you know why -- no that's not the way

8 I'll ask it. Tell what you this is

9 difficult because it's uncomfortable. How

10 about this would you say that most of the

11 district's private school students are

12 children from the orthodox and Hasidic

13 Jewish computes?

14 A. I would say that most of the

15 district's private school students are white

16 students yes.

17 Q. When you say -- you answered

18 white. I was asking whether most of the

19 private school students in East Ramapo are

20 from the orthodox and Hasidic Jewish

21 communities; is that, true?

22 A. Yes, and they're white right.

23 Q. That is also true do you know

24 whether most of the private schools -- how

25 about this: Would you agree that most of

MsJeanFields_Rough

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2 the private schools in East Ramapo are

3 orthodox and Hasidic Yeshivas?

4 A. I would imagine so.

5 Q. When I say Yeshiva do you know

6 what I mean by that?

7 A. Yes.

8 Q. What is a Yeshiva?

9 A. A Jewish school.

10 Q. All right. Let me ask you a few
11 questions about political career?

12 MR. JASON: Are we going to take
13 our break.

14 MR. LEVINE: Do you want to take
15 last three minutes until we get to 3
16 o'clock.

17 MR. JASON: I have that it's
18 past three.

19 MR. LEVINE: Let's take our
20 break now before we swift gears.

21 (Recess taken.)

MsJeanFields_Rough

22 Q. Picking up somewhere around
23 where we left off, do you believe that the
24 budget deficits that started in 2009 were
25 the fault of the board of education?

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2 A. I have no idea. I don't know.
3 Q. Do you believe that if there had
4 been different people elected to the board
5 of education there would not have been
6 budget cuts from 2009 through 2012?
7 A. I don't know that either.
8 Q. You ran for the school board
9 yourself, right?
10 A. I did.
11 Q. What year did you run for the
12 school board?
13 A. 2016.
14 Q. When you ran for the school
15 board in 2016, were you part of a slate of
16 candidates?
17 A. Yes. Yes.

MsJeanFields_Rough

18 Q. Did your slate have a campaign
19 platform?

20 A. Yes.

21 Q. What was your platform?

22 A. Our slogan was education for
23 all.

24 Q. Did your slate have official
25 positions on education policy?

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2 A. We believe in educating all
3 students.

4 Q. Did your slate have an official
5 position on the East Ramapo property tax
6 rate?

7 A. Not yet.

8 Q. What do you mean by not yet?

9 A. Well, we needed to -- we needed
10 to get a seat on the board in order to tell
11 what our views were.

12 Q. Why didn't you want to say what
13 your reviews were while you were

MsJeanFields_Rough

14 campaigning?

15 A. Because it wasn't always
16 feasible to get to see the things we needed
17 to see.

18 Q. Do you mean that you needed to
19 be on the board to have enough information
20 to be able to take a position on the
21 property tax rate?

22 A. We actually -- yes, we needed to
23 get more information on property tax rate
24 what the school was submitting what the
25 school -- we needed a detailed -- what do

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2 you call it.

3 Q. A budget?

4 A. A detailed budget, but more than
5 the detailed budget because there are
6 certain things that are in the budget. Not
7 serving a line item there are some things
8 that are hidden in there. We needed to see
9 all that.

MsJeanFields_Rough

10 Q. If you recall did any of your --
11 did you have a campaign materials when you
12 were running for the school board?

13 A. Yes.

14 Q. Did any of your campaign
15 materials reference property taxes in any
16 way?

17 A. I don't remember.

18 Q. Did your campaign slate have an
19 official position on the school district's
20 bussing policy?

21 A. I don't remember. I know he
22 we've always had universal bussing.

23 Q. What do you mean by universal
24 bussing?

25 A. Every child is entitled to ride

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2 on the school bus.

3 Q. What do you mean by always had
4 universal bussing?

5 A. As far as long as I could

MsJeanFields_Rough

6 remember there has been universal bussing.

7 Q. Did your campaign slate have a
8 position on whether the school district
9 should maintain universal bussing?

10 A. I don't remember that coming up.

11 Q. Did your campaign slate take any
12 official positions on any district services
13 affecting private school students?

14 A. You know we were concerned about
15 getting the best education for public school
16 students. And that's really what we
17 concentrated on. We wanted the public
18 schools to be as good as they could be. I'd
19 say as good as they were before. Like I
20 would say that every parent wants that.

21 Q. So services for private school
22 students were not a major part of your
23 campaign is that a fair statement?

24 A. That's a fair statement.

25 Q. Did your campaign take any

54

MsJeanFields_Rough

2 official position on reducing district
3 services to private school students?

4 A. No.

5 Q. Did your campaign take any
6 official position on maintaining district
7 services to private school students?

8 A. No.

9 Q. Did you in your campaign make
10 any effort to appeal to the parents of
11 private school students to vote for you?

12 A. There were private school
13 parents who reached out to us.

14 Q. Do you remember specifically?

15 A. I don't know who they were. I
16 mean I don't remember their names. I know
17 it was a group of women from the private
18 school community who met us at the library
19 and their intent was that they wanted to
20 support us and they also wanted their
21 children to be educated.

22 Q. In that context do you mean by
23 saying private school community the orthodox
24 and Hasidic Jewish communities?

25 A. Yes.

MsJeanFields_Rough

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2 Q. Did you meet with those women at
3 the library?

4 A. Yes.

5 Q. Do you recall when about that
6 meeting may have occurred?

7 A. I don't recall. I don't recall,
8 but it has to be within the campaign year,
9 so.

10 Q. Do you recall who was there
11 during that meeting?

12 A. Don't ask me names. I don't
13 know their names.

14 Q. Who from your slate besides you
15 if anyone was there?

16 A. All of them.

17 Q. So --

18 A. All of us were there.

19 Q. Did you bring anybody else with
20 you to the meeting?

21 A. I don't remember who else was

MsJeanFields_Rough

22 there.

23 Q. Do you remember about how many
24 people were there?

25 A. I don't. 40-ish.

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2 Q. Do you remember about how many
3 people there at least appeared to be from
4 the orthodox and Hasidic Jewish communities?

5 A. Majority.

6 Q. Do you remember what was
7 discussed in the meeting?

8 A. I believe I mentioned that
9 before, they wanted their kids to also be
10 educated and not just religious studies, but
11 in secular education.

12 Q. What did you say in response to
13 them?

14 A. That we would look into it and
15 to as much as possible because all
16 children -- it's actually I think it's a
17 miss service to everyone when children are

MsJeanFields_Rough

18 not educated.

19 Q. Did you tell them that?

20 A. Yes they told us that.

21 Q. Did they express any other of
22 their interests to you?

23 A. No, they were mainly concerned
24 about their kids getting an education.

25 Q. Did they offer to help your

57

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2 campaign?

3 A. Yes, they did.

4 Q. What did they offer to do?

5 A. Speak to their neighbors,
6 distribute material. They attempted to do
7 set up a meeting which never came to
8 fruition.

9 Q. A meeting with who?

10 A. With other members of their
11 community.

12 Q. Do you know why that never
13 occurred?

MsJeanFields_Rough

14 A. I don't know.

15 Q. How did you meet the women who
16 set up this meeting?

17 A. It was just one woman and I
18 don't remember. Someone must have reached
19 out to her she reached out to someone and we
20 all got together.

21 Q. Did you ever speak with her
22 again?

23 A. Yes I've since speak with her.

24 Q. Do you remember her name?

25 A. I told you I don't.

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2 Q. Do you exchange e-mail website
3 her?

4 A. I've spoken to her by phone.

5 Q. Do you know whether the women
6 who were at this meeting in fact talked to
7 their neighbors and did the things they said
8 they would do to help your campaign?

9 A. I don't know.

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MsJeanFields_Rough

10 Q. Can you any of any time when you
11 exchanged any form of written communication
12 with the women?

13 A. No.

14 Q. Text message?

15 A. No.

16 Q. Besides that meeting, did you do
17 anything else in particular to try to appeal
18 to voters from the orthodox and Hasidic
19 Jewish communities?

20 A. No.

21 Q. It you campaign in any orthodox
22 and Hasidic Jewish neighborhoods?

23 A. Not exclusively.

24 Q. Did you campaign in orthodox and
25 Hasidic Jewish neighborhoods at all?

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2 A. Not exclusive I campaigned in
3 neighborhoods where there were some
4 orthodox.

5 Q. I understand what you mean?

MsJeanFields_Rough

6 A. Catch.

7 Q. What neighborhoods are those?

8 A. Spring Valley, Spring Valley

9 proper, Pomona, hill crest chestnut ridge

10 that's all I recall. Mostly Spring Valley.

11 Q. Were you well received in those
12 neighborhoods?

13 A. Yes.

14 Q. When you referred to exclusively
15 orthodox and Hasidic Jewish neighborhoods
16 before, what neighborhoods were those?

17 A. Kaser, some of Monsey and new
18 square.

19 Q. You didn't campaign in those
20 neighborhoods?

21 A. No.

22 Q. Why not?

23 A. Because I didn't think I would
24 be welcome there.

25 Q. Why didn't you think you would

60

MsJeanFields_Rough

2 be welcome there?

3 A. Because when my husband and I
4 first moved to Rockland County we didn't
5 know the county and we drove into a street
6 in new square and we were surrounded by
7 bunch of men and we were escorted out.

8 Q. Did the women you met with from
9 the orthodox and Hasidic Jewish communities
10 offer to campaign for you in those
11 exclusively orthodox and Hasidic Jewish
12 neighborhoods?

13 A. They said amongst their friends.
14 I don't know where their friends were.

15 Q. So you don't know whether they
16 were offering to campaign in New Square,
17 Kaser?

18 A. No.

19 Q. Do you have any -- form any
20 understanding of your own as to why the new
21 square community, for example, is
22 exclusively Hasidic orthodox Jews?

23 MR. JASON: Objection.

24 A. No, I don't know.

25 Q. You understand what I'm getting

MsJeanFields_Rough

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2 at? Do you know why or have any
3 understanding why Kaser, for example, why
4 the people there are exclusively orthodox
5 and Hasidic Jews?

6 MR. JASON: Objection.

7 A. I don't.

8 Q. Do you know whether orthodox and
9 Hasidic Jews exclusively send their children
10 to private schools?

11 MR. JASON: Objection.

12 A. Could you repeat that?

13 Q. Yes.

14 Before we had defined the
15 private school community in this context as
16 referring to orthodox and Hasidic Jews, and
17 so the question is, do you know whether
18 orthodox and Hasidic Jews send their
19 children to private schools exclusively?

20 A. I don't know.

21 Q. When you were campaigning for

MsJeanFields_Rough

22 the public school board did your campaign

23 have a get out to vote effort?

24 A. Yes, we did.

25 Q. What sort of things did you do

62

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2 to get out to vote?

3 A. We went to radio stations we

4 visited many churches, we went to some

5 community gatherings people hosted and

6 mostly door to door knocking on doors.

7 Q. Did you do anything in

8 particular to try to help people get to the

9 policies on election day?

10 A. Yes, we did.

11 Q. What did you do?

12 A. We set up transportation.

13 People volunteered their times to drive

14 people to the polls.

15 Q. Do you know about how many

16 people made use of that service?

17 A. How many people?

MsJeanFields_Rough

18 Q. Made use of that service?

19 A. I don't know. I was not
20 involved with that part.

21 Q. Do you know whether any other
22 organizations offered similar services to
23 voters on election day?

24 MR. JASON: Objection.

25 A. I don't know.

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2 Q. Do you recall how many people
3 volunteered as part ever your effort to
4 drive people to the polls?

5 A. I couldn't tell you that.

6 Q. Before your run for the school
7 board had you ever been involved in politics
8 directly before?

9 A. As in running for office.

10 Q. Um-hum.

11 A. No.

12 Q. So you had never ran for office
13 before you ran for the school board in 2016?

MsJeanFields_Rough

14 A. That's correct.

15 Q. Did anyone on your slate have
16 any prior political experience?

17 A. Just one person.

18 Q. Who is that?

19 A. Sabrina Charles Pierre.

20 Q. If you recall what was
21 Ms. Charles Pierre's prior political
22 experience?

23 A. She was the end incumbent.

24 Q. Did the NAACP of Spring Valley
25 support your campaign in 2016?

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2 A. The NAACP does not take a
3 political stand on anything.

4 Q. Does that mean the NAACP Spring
5 Valley doesn't endorse candidates?

6 A. They'll vote for candidates, but
7 they won't go out and speak on their behalf.

8 Q. Does the NAACP of Spring Valley
9 have like a get out to vote effort of their

MsJeanFields_Rough

10 own?

11 A. They host a forum, but they
12 don't say I vote for republican or democrat.
13 They just make candidates available so that
14 the public can see.

15 Q. Did NAACP of Spring Valley do
16 voter registration drives?

17 A. Yes, we do.

18 Q. For how long have the NAACP been
19 doing those kinds of voter registration
20 drives?

21 MR. JASON: Objection.

22 A. I don't know for how long. For
23 as long as I've been a member I've been
24 involved in that.

25 Q. How long has that been?

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2 A. Seven, eight years.

3 Q. In your experience in the
4 community, would you say there is a high
5 degree of voter interest in school board

MsJeanFields_Rough

6 elections in East Ramapo black community?

7 MR. JASON: Objection.

8 A. No, there isn't. It's getting
9 better.

10 Q. Why do you think that is?

11 A. Because the efforts to get out
12 to vote and to register voters.

13 Q. Why do you think there isn't a
14 high degree of interest now though?

15 MR. JASON: Objection.

16 A. I don't know. I think when one
17 loses all the time one gets gun shy.

18 Q. So was there a period of time
19 when there was higher degree of interest in
20 school board elections in the black
21 community in East Ramapo?

22 MR. JASON: Objection.

23 A. I believe so, but I couldn't
24 tell you when.

25 Q. Do you know or rather do you

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MsJeanFields_Rough

2 have a sense for whether voter turnout from
3 black neighborhoods in East Ramapo is --
4 whether there is a higher voter turnout?

5 MR. JASON: Objection.

6 Q. Do you have a sense whether
7 there is higher voter turnout in black
8 neighbors in East Ramapo?

9 A. Black and Hispanic or just black
10 minority we will say minority.

11 Q. We will say minority?

12 A. There isn't, but I think every
13 year it gets a little higher.

14 Q. Can I ask it again so it's not
15 so jumbled.

16 In your experience is there a
17 high voter turnout from the minority
18 immunity in East Ramapo?

19 MR. JASON: Objection.

20 A. I'm not sure how is that
21 different from your last question.

22 Q. It was the same as the last
23 question I just jumbled it before so for the
24 sake of the transcript I repeated it?

25 A. I'm going ask you to repeat it

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2 one more time.

3 Q. In your experience do you
4 believe that there is a high degree of voter
5 turnout from the minority community in East
6 Ramapo?

7 MR. JASON: Objection.

8 A. I believe it's getting higher
9 every year.

10 Q. Do you believe it's been
11 historically low?

12 A. In the past, yes.

13 Q. Were you successful in your run
14 for the school board?

15 A. No I was not.

16 Q. Do you think you lost the
17 election because you're black?

18 A. No I think I lost the election
19 because someone else got more votes.

20 Q. Do you think that black
21 residents of East Ramapo have a fair

MsJeanFields_Rough

22 opportunity to run for the school board?

23 A. No I don't believe that.

24 Q. Why not?

25 A. First of all I would like an

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2 opportunity to -- to voice what my concerns

3 are and since there is always -- the

4 residents -- the minority residents never

5 have an opportunity to get in, on the school

6 board, so it's always the other side, the

7 other community, and something about that.

8 Q. Well, let's drill down on that a

9 little bit.

10 Do the residents from the

11 minority community, are they not able to get

12 elected to the school board because they're

13 minorities?

14 MR. JASON: Objection.

15 A. I don't think so. I think it's

16 because they don't have enough votes.

17 Q. Why do you think they don't have

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18 enough votes?

19 A. Because in the Jewish -- the
20 orthodox and Hasidic communities there is
21 something called a bloc vote and whatever
22 their interests are the bloc vote always
23 wins.

24 Q. Does the bloc vote that as you
25 describe it, do they vote for minority

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2 candidates?

3 MR. JASON: Objection.

4 A. They vote for people who have
5 their interests at heart whether they're
6 minority or not.

7 Q. Your understanding is that the
8 orthodox and Hasidic Jewish communities vote
9 for candidates who align with their
10 interests regardless of their rates?

11 A. Yes.

12 Q. In your experience in East
13 Ramapo, has there ever been a problem with

MsJeanFields_Rough

14 minority voters being kept away from the
15 polls?

16 A. Not that I know of.

17 Q. Do you know or rather in your
18 experience have you ever seen candidates for
19 the school board in East Ramapo ever you
20 know campaign on an issue specifically about
21 race?

22 A. I have not, but I would like to
23 take a break.

24 MR. LEVINE: That's fine.

25 (Recess taken.)

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2 Q. In 2016 you ran against opposing
3 slate, right?

4 A. Yes.

5 Q. And that opposing slate included
6 gentleman by the name of Pierre Germain do
7 you remember that?

8 A. Yes.

9 Q. And also by a name by the name

MsJeanFields_Rough

10 of Bernard Charles do you remember that?

11 A. Yes.

12 Q. And also a third candidate by
13 the name Yehuda Weissmandl do you remember
14 that?

15 A. Yes.

16 Q. You specifically ran against
17 Mr. Germain, right?

18 A. Yes, he.

19 Q. Do you know Mr. Germain?

20 A. I've seen him.

21 Q. Have you ever spoken to him?

22 A. Hello how are you that kind of
23 thing not had a conversation with him.

24 Q. Mr. Germain is a Haitian
25 gentleman?

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2 A. Yes, he is of Haitian dissent.

3 Q. Do you know anything about
4 Mr. Germain's policy or preferences for the
5 board of education?

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6 MR. JASON: Objection.

7 MR. LEVINE: You're right.

8 Q. Do you know anything about Mr.

9 Germain's campaign platform from 2016?

10 A. No, I don't.

11 Q. Do you know Mr. Charles?

12 A. Yes.

13 Q. How do you know Mr. Charles?

14 A. He's a member of the board.

15 Q. Have you ever spoken with

16 Mr. Charles?

17 A. Briefly also.

18 Q. Any more than pleasantries?

19 A. No.

20 Q. Do you know anything about

21 Mr. Charles's campaign platform when he ran

22 in 2016?

23 A. No, I don't.

24 Q. Do you know whether Mr. Charles

25 Mr. Germain and Mr. Weissmandl ran on an

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MsJeanFields_Rough

2 official slate?

3 A. I don't know that.

4 Q. If you look at your declaration
5 on page 11 paragraph 35, it says I was not
6 invited to any candidate forum in the
7 predominantly white communities of East
8 Ramapo including new square Kaser or Monsey
9 do you see that?

10 A. Yes.

11 Q. Do you know whether there were
12 any candidate forums in those areas in 2016?

13 A. I do not know.

14 Q. So when you say that you were
15 not invited, you don't know that there was
16 anything candidate forum to have been
17 invited to?

18 A. That's correct.

19 Q. In this context when you say
20 predominantly white communities of East
21 Ramapo because you're referring to new
22 square Kaser or Monsey am I correct in
23 assuming that you're referring to the
24 orthodox and Hasidic Jewish communities?

25 MR. JASON: Objection.

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2 A. Yes.

3 Q. The second sentence of the same
4 paragraph says I was not invited to campaign
5 in any of these predominantly white
6 neighborhoods villages or ham let's in East
7 Ramapo to do you see that?

8 A. Yes.

9 Q. Do you know whether anyone was
10 invited to campaign in those neighborhoods?

11 A. Where the campaigns took place I
12 don't know.

13 Q. And the final sentence of the
14 same paragraph you say that you did not
15 campaign in those neighbors, right?

16 A. Yes.

17 Q. Let's look at the next
18 paragraph, paragraph 36 where you say I do
19 not know which organizations or community
20 leaders endorsed the slate on which my
21 opponent ran do you see that?

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22 A. Yes.

23 Q. Do you know whether any
24 organization or community leader endorsed
25 the slate your opponent ran on?

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2 A. No, I don't.

3 Q. Second sentence you say I was
4 never offered an opportunity to compete for
5 a position on that slate or for the
6 endorsement of the community leaders who
7 endorsed my opponent do you see that?

8 A. Yes.

9 Q. Are you aware whether there was
10 a competition for a position on that slate
11 that you could have been offered?

12 MR. JASON: Objection.

13 Q. I didn't say that quite right,
14 but do you understand what I mean.

15 You say you were never offered
16 an opportunity to compete for a position on
17 the slate do you know whether there was a

MsJeanFields_Rough

18 competition for a position on the slate?

19 A. The fact that there public
20 school employees running and people with the
21 interest of the private school, begs the
22 assumption that there competition.

23 Q. What I mean is do you know
24 whether you know your over point Mr. Germain
25 had to compete with anybody to be on the

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2 slate he was on?

3 A. He competed with me.

4 Q. For the election right? Did you
5 want to compete to be on the private school
6 community slate?

7 A. No.

8 Q. Do you know whether there was a
9 competition to be on the private school
10 community slate?

11 A. I'm not sure I get your
12 question. I'm understanding it differently.

13 Q. I'm having trouble communicating

MsJeanFields_Rough

14 it I guess.

15 The idea you say you were never
16 offered an opportunity to compete for the
17 position on the slate on which your opponent
18 ran, do you see that?

19 A. Yes.

20 Q. That assumes there was a?

21 A. Private school slate.

22 Q. Right. And that there was some
23 opportunity that you could have been
24 offered, but weren't, right?

25 A. I think that if you lived in

76

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2 Rockland you would know that there are
3 public school candidates and private school
4 candidates that's it.

5 Q. Why would you offered an
6 opportunity to run on the private school
7 slate?

8 A. To let them know what my
9 thoughts were.

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10 Q. Weren't you already on the

11 public school slate also?

12 A. Yes, I was.

13 Q. So if you're on the public

14 school slate why would you be an opportunity

15 to run on the private school slate?

16 A. Because the public school slate

17 I would imagine not. I would imagine I know

18 is competing against the private school

19 slate.

20 Q. Right. For the election?

21 A. Yes.

22 Q. That's what their campaign is

23 about. I mean before that, the slating

24 process. When you got together with your

25 slate for the public school community

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2 presumably the private school got

3 together --

4 A. Exactly.

5 Q. With their slate. I just don't

MsJeanFields_Rough

6 understand why you would be offered a
7 position, offered a chance to compete on the
8 private school slate if you're already on
9 the public school slate?

10 A. Because they are opposed to each
11 other. One opposes the other.

12 Q. So you run against each other in
13 the election?

14 A. Yes.

15 Q. Maybe I'm misunderstanding the
16 declaration. It sounds to me as you are
17 saying you were never offered an opportunity
18 to be on both slates?

19 A. No. I don't think that's what
20 I'm saying.

21 Q. So that's not what you're
22 saying.

23 What are you saying in the
24 second sentence of this paragraph?

25 A. I am -- I was not invited that's

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MsJeanFields_Rough

2 the one or no.

3 Q. Second sentence of paragraph 36?

4 A. I was never offered an
5 opportunity to compete for a position on
6 that slate or for the endorsement of the
7 community, so it's either or. When the
8 forums are being set up, everyone is
9 invited. The NAACP and JAMCCAR sets up a
10 candidate forum and they invite all the
11 candidates that are running. When they're
12 setting up a forum and I tone know that they
13 did, public -- no everyone was invited I
14 don't even know if there was a forum.

15 Q. Does the private school
16 community to your knowledge hold candidate
17 forums?

18 A. I don't know. I would -- I
19 don't know.

20 Q. Do you know anything about how
21 they go about selecting candidates?

22 A. I have no idea.

23 Q. Do you know whether there is any
24 kind of formal process involved?

25 A. I don't know.

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2 Q. So when you say that you weren't
3 offered a tune to compete for the
4 endorsement of community leaders who
5 endorsed your opponent do you know whether
6 any community leaders endorsed your
7 opponent?

8 A. I know he got more votes and he
9 voted with the interests of the private
10 schools.

11 Q. How do you know that?

12 A. Because when the results come
13 out you see it.

14 Q. How can you tell from the
15 results that he votes from the private
16 school community?

17 A. His votes came from private
18 schools.

19 Q. Yes?

20 A. So it's set up in geographical
21 district for each geographical district it

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22 tells you how many votes the person got in
23 that didn't.

24 Q. So do you know whether any
25 community leaders endorsed Mr. Germain?

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2 A. I don't know.

3 Q. Do you know whether any
4 community leader from the private school
5 community, you know holds a competition for
6 their endorsement?

7 A. I don't think it's called a
8 competition.

9 Q. I'm just trying to understand
10 why you say that you were never offered an
11 opportunity to compete for endorsements of
12 the community leader who endorsed your
13 opponent?

14 A. To compete for position on the
15 slate or for the endorsement.

16 Q. So you're saying you weren't
17 offered an opportunity to compete for the

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18 endorsements of the community leaders who
19 endorsed your opponent?

20 MR. JASON: Objection to form.

21 A. That's correct. I don't know
22 who they were.

23 Q. Do you know that there were any?

24 A. No, I don't know that either.

25 Q. So in the third sentence when

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2 you say I do not know what criteria those
3 organizations or leaders used to slate or
4 endorse their preferred candidates, do you
5 know whether there are any such criteria?

6 A. I don't know that, but there has
7 to be a way to choose someone to run there
8 has to be some formal process to choose
9 someone to run for office I'm just saying I
10 don't know what they did.

11 Q. Why do you say that, did you
12 need to do anything in particular to run for
13 the school board?

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14 MR. JASON: Objection.

15 A. Yes.

16 Q. What did you need to do?

17 A. I had to go to a public forum

18 with maybe six or seven candidates who

19 propose, you know, candidates and we were

20 asked many questions from the public and

21 there was a body of people who were at the

22 end of the evening went back and processed

23 whatever and then determined which three

24 people should run for office.

25 Q. I'm asking something an a little

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2 bit different. I understand there was a

3 process that you needed to go through to get

4 onto a certain slate, but just to run for

5 the school board, you don't need to be on a

6 slate do you?

7 A. You don't need to. You just

8 need to apply you need to have a certain

9 number of signatures and you need to make a

MsJeanFields_Rough

10 formal application to the board of
11 education.

12 Q. Right. So there is no reason
13 why three people can't go down to the school
14 district and file those paper and run for
15 the school board?

16 MR. JASON: Objection.

17 A. With the proper signatures.

18 Q. Right they don't need a formal
19 slate to do that?

20 MR. JASON: Objection.

21 Q. Do they?

22 A. No I don't think so.

23 Q. Right. So do you know whether
24 your opponent Pierre Germain Bernard Charles
25 and Yehuda Weissmandl went through any

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2 formal slating process?

3 A. No. They probably just got
4 together with the same interests and decided
5 to.

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6 Q. Right possible.

7

8 MR. LEVINE: Off the record.

9 (Discussion off the record.)

10 Q. Two of your opponents in the

11 2016 election were black men, right?

12 A. One was.

13 Q. Mr. Charles was a black man,

14 right?

15 A. Wasn't my opponent.

16 Q. Two members of the opposing

17 slate were black men, right?

18 A. Yes.

19 Q. And your understanding is that

20 they were supported by the orthodox and

21 Hasidic Jewish communities, right?

22 A. Yes.

23 Q. Do you think that the race of

24 the candidates in your election was a

25 motivating factor for any of the voters who

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MsJeanFields_Rough

2 voted?

3 A. No I have no further questions.

4 MS. MATTHEWS: I don't have any
5 questions.

6 MR. JASON: Off the record.

7 (Discussion off the record.)

8 MR. JASON: No questions from
9 plaintiffs.

10 (Time noted: ^ ^
11 ^ a.m. ^ p.m.)

12 _____
13 WITNESS NAME

14
15 Subscribed and sworn to before me
16 this ____ day of _____, 201_.

17
18 _____
19 Notary Public

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